

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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NOREEN SHEA,

Plaintiff,

-against-

VILLAGE OF POMONA, BRETT YAGEL,

Defendants.  
-----X

Civ. No.: 18-CV-11170 (CS)


**NOTICE OF MOTION FOR SUMMARY JUDGMENT**

PLEASE TAKE NOTICE, that upon the enclosed Affirmation of Joseph A. Saccomano, Jr., Esq., with annexed Exhibits, the accompanying Memorandum of Law, the accompanying Local Civil Rule 56.1 Statement of Undisputed Material Facts, and all prior pleadings and proceedings in this action, Defendant, Brett Yagel (“Defendant Yagel”), hereby moves this Court, before the Honorable Cathy Seibel, United States District Judge, in the United States District Court for the Southern District of New York, 300 Quarropas Street, Courtroom 621, White Plains, New York 10601-4150, on a date and time to be determined by the Court, for an Order pursuant to Rule 56 of the Federal Rules of Civil Procedure dismissing Plaintiff Noreen Shea’s claim asserted against Defendant Yagel as set forth in Plaintiff’s Complaint in its entirety, with prejudice and for such further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the schedule set by the Court’s Order dated March 13, 2020, Plaintiff’s Opposition is due on or before June 10, 2020, and Defendant’s Reply, if any, is due on or before June 24, 2020.

Respectfully submitted,

JACKSON LEWIS P.C.  
44 South Broadway, 14th Floor  
White Plains, New York 10601  
Tel.: (914) 872-8060  
Fax: (914) 946-1216

By:   
\_\_\_\_\_  
Joseph A. Saccomano, Jr.  
John T. Cigno

*Attorneys for Defendant Brett Yagel*

Dated: May 8, 2020

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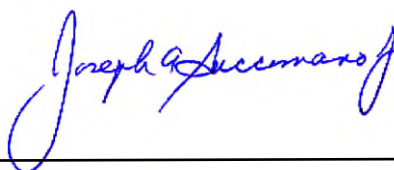
Civ. No.: 18-CV-11170 (CS)

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of Defendant Brett Yagel's Notice of Motion For Summary Judgment has been served via ECF and First Class Regular Mail on May 8, 2020 on counsel of record at the address listed below:

Michael H. Sussman  
Sussman & Associates  
P.O. Box 1005  
Goshen, NY 10924  
*Attorneys for Plaintiff*

Kenneth Ethan Pitcoff  
Morris Duffy Alonso & Faley  
2 Rector Street  
New York, NY 10006  
*Attorneys for Defendant Village of Pomona*



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Joseph A. Saccomano, Jr.